



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

ABS:AE  
F. #2017R00031

*271 Cadman Plaza East  
Brooklyn, New York 11201*

April 8, 2020

By FedEx and Email

Richard Harrow, Esq.  
O'Connell & Aronowitz  
54 State Street  
Albany, NY 12207

Re: United States v. Anna Steiner  
Criminal Docket No. 19-295 (ILG)

Dear Mr. Harrow:

The government is sending to you by email and on a separately enclosed disc the government's fifth production of discovery (the "Production"). The Production has been encrypted, and the password will be sent to you separately by email. The contents of the Production have been designated "confidential" under the terms of the Protective Order in this case that was agreed to and acknowledged by you. The government also requests reciprocal discovery from the defendant.

Included in the Production are emails sent by the defendant to the government in February 2020. (DOJ\_AS\_065423 to DOJ\_AS\_065426). In addition, pursuant to your request and for your convenience, the enclosed disc contains documents and information concerning certain prior statements by the defendant, including post-arrest statements, that were previously produced to prior defense counsel.

\* \* \*

The government hereby renews its request for reciprocal discovery under Rule 16(b) of the Federal Rules of Criminal Procedure. The government requests that the defendant allow inspection and copying of (1) any books, papers, documents, data, photographs, tapes, tangible objects, or copies or portions thereof, that are in the defendant's possession, custody or control, and that the defendant intends to introduce as evidence or otherwise rely on at trial, and (2) any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this case, or copies thereof, that are in the defendant's possession, custody or control, and that the defendant intends to

introduce as evidence or otherwise rely upon at trial, or that were prepared by a witness whom the defendant intends to call at trial.

The government also requests that the defendant disclose prior statements of witnesses who will be called by the defendant to testify. See Fed. R. Crim. P. 26.2. In order to avoid unnecessary delays, the government requests that the defendant have copies of those statements available for production to the government no later than the commencement of trial.

The government also requests that the defendant disclose a written summary of testimony that the defendant intends to use as evidence at trial under Rules 702, 703, and 705 of the Federal Rules of Evidence. The summary should describe the opinions of the witnesses, the bases and reasons for the opinions, and the qualification of the witnesses.

Pursuant to Fed. R. Crim. P. 12.3, the government hereby demands written notice of the defendant's intention, if any, to claim a defense of actual or believed exercise of public authority, and also demands the names and addresses of the witnesses upon whom the defendant intends to rely in establishing the defense identified in any such notice.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Andrew Estes  
Andrew Estes  
Trial Attorney  
(718) 254-6250

Enclosures (by FedEx and email only)

cc: Clerk of the Court (ILG) (by ECF) (without enclosures)